

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

LEGACY HOUSING CORPORATION

CIVIL ACTION NO. 2:24-cv-00460

Plaintiff,

VERSUS

JUDGE: JAMES D. CAIN, JR.

COUNTRY AIRE HOMES OF LA, LLC, et al.

MAGISTRATE JUDGE: DAVID J. AYO

Defendants.

COUNTRY AIRE HOMES OF LA, LLC, GULF
STREAM HOMES OF LA, LLC, GULF STREAM
HOMES OF MS, LLC, GULF STREAM MANOR
PHASE 2 HOMES, LLC, IOWA HOMES, LLC,
SINOP GS HOMES, LLC, SOUTHERN POINTE
HOMES, LLC, SOUTHERN POINTE
INVESTMENTS LLC, SOUTHERN POINTE
INVESTMENTS II LLC, STELLAR GS HOMES LLC
and WILLIAM RODWELL,

Counterclaimants,

VERSUS

LEGACY HOUSING CORPORATION and CURTIS
HODGSON,

Counterclaim Defendants.

**INDIVIDUAL DEFENDANTS' MOTION TO DISMISS
COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure and Local Rule 7.1(h),
defendants Eric Wooten, Robert Hutson, and Tony Hartsgrove (collectively, "Individual
Defendants"), respectfully move to dismiss the Complaint filed by Plaintiff Legacy Housing

Corporation for lack of personal jurisdiction.¹ The grounds for the relief requested in this Motion are set forth in the Individual Defendants' supporting brief, which accompanies this Motion.

Dated: May 28, 2024.

/s/ Eliyahu Ness

Eliyahu "Eli" Ness

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¹ Defendants William Rodwell; Country Aire Homes of LA, LLC; Gulf Stream Homes of LA, LLC; Gulf Stream Homes of MS, LLC; Gulf Stream Manor Phase 2 Homes, LLC; Iowa Homes, LLC; SINOP GS Homes, LLC; Southern Pointe Homes, LLC; Southern Pointe Investments LLC; Southern Pointe Investments II LLC; and Stellar GS Homes, LLC do not join this motion.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on Plaintiff's counsel of record by filing a copy of the foregoing document electronically with the Clerk of Court using the CM/ECF system on May 28, 2024.

By: /s/ *Eliyahu Ness*
Eliyahu Ness